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STATE OF MINNESOTA  
COUNTY OF ~~RAMSEY~~  
Dakota County

1st  
~~SECOND~~ JUDICIAL DISTRICT  
DISTRICT COURT  
CASE TYPE Civil rights  
FILE NUMBER

19HA-CV-195928

Howard Jackson  
PLAINTIFF

VS.

COMPLAINT

Marathon Corporation  
Speedway  
DEFENDANT

Filed in District Court  
State of Minnesota  
DEC 23 2019

PLAINTIFF, as and for its cause of action against the above-named defendant states and alleges as follows:

1. Howard Jackson became a cashier work at 1285 Speedway West St Paul MN 55118 NOV 7<sup>th</sup> 2019  
Jackson Suing for Whistleblower Retaliation Act Claim  
The False Claim Act, Discrimination Race
2. Wrongfully Removed from my fulltime 40 hours a week  
Then fired. Dec 14<sup>th</sup> 2019 got A verbal written up by  
Store Manager Tracy ON Dec 15<sup>th</sup> got removed from schedule
3. All this happened when i had everything Audio Recording  
The day Dec 14<sup>th</sup> Tracy said he was written me up for  
the wet floor mop thing. Said i cussed at a worker never  
will prove later. Then changed up said i cussed him out.
4. I then called Jesse Sinadinas in back office before i  
left as Tracy told me to with Maria around, Told Jesse didn't  
like written up, so we need to talk about the illegal things  
And misconducts going on with Tracy, Maria, Carl on recording
5. Jesse set a date to meet my day off on Monday  
Dec 16<sup>th</sup> Should of been about the illegal misconducts  
Reported. It was the other way around of being fired

6. ~~Said~~ I Reported Sexual harassment by maria assistant manager. The same lady who told me Tracy was doing the same to her.

Maria is the same lady who told me about her and ex

7. Jason Manager Stealing and got away with it.

Reported Carl and Tracy misconducts Dec 5th Carl was supposed to start work that night loun late started

8. I am Tracy went to pick him up.

Dec 6th told Tracy about Carl selling drugs the day we worked Called off on Dec 7th because I was too mad working busting my butt and he selling.

9. Carl is a white American cashier, Tracy A white American store manager would give Carl 52 hours a week I asked for over-time the day I worked with Justice who needed help was told No. I apply for Manager position was told I need License to become one by Tracy and Jesse but Maria has no license

WHEREFORE, Plaintiff demands judgment against defendant as follows:  
and 3 Felonies and she is A white American Manager at store  
Damage payments to me.

would like to be Compensation for my lost 40 hours

Removing me from Schedule \$500.00 Dec 16th sent email

to SD Morris Demanding 24 hours check 3:35 pm haven't got it Seeking the fine for day \$100.00. Seeking \$850,000

for being wrongfully terminated. And for Tracy telling Carl about the personal information I told him Carl was

Selling Drugs Carl Confronted me 12:13 AM Dec 16th said Tracy told him

PROOF Text message complaint letter Auto Recording witness  
EX Employee Justice on why she quit

PLAINTIFF

VERIFICATION AND ACKNOWLEDGEMENT

Speedway

A. I have read this document. To the best of my knowledge, information the information, contained in the document is well grounded in fact and is warranted by existing law.

B. I have not been determined by any court in Minnesota or in any other State to be a frivolous litigant or subject to an Order precluding me from serving and filing this document.

C. I am not serving or filing this document for any improper purpose, such as to harass the other party or to cause delay or needless increase in the cost of litigation or to commit a fraud on the Court.

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D. I understand that if I am not telling the truth or if I am misleading the court or if I am serving of filing this document for any improper purpose, the court can order me to pay money to the other party, including reasonable expenses incurred by the other party because of the serving of filing of this document such as court costs, and reasonable attorneys fees.

Howard Jackson  
PLAINTIFF

ADDRESS  
153 Emerson Ave E #204 West St. Paul  
MIN 55118

TELEPHONE 651-508-7916

SUBSCRIBED AND SWORN TO BEFORE ME  
THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_

\_\_\_\_\_  
NOTARY PUBLIC/COURT CLERK

MY COMMISSION EXPIRES \_\_\_\_\_

Howard Jackson

12/16/2019

ME

Speedway 1285 S Robert St  
West St. Paul MN 55118  
Cashier employee

The Text and pic  
Recording will show  
who is right and wrong  
at the End

To: The Speedway Corporations in Minnesota  
To: Speedway Corporations / Marathon petroleum  
Headquarters 500 Speedway Drive  
Enon Ohio

Filed in District Court  
State of Minnesota  
DEC 23 2019

- (A) Notice to take civil action
- (B) My Complaint whistleblower illegal activities
- (C) wrongfully Actions taking against me  
by: managers (1) Tracy (2) Maria (3)  
(4) District manager...
- (#4) maria spoliation on last manger of  
store Black guy Jason
- (#5) Carl

Demand 30 day's to  
work it out settle or  
Sorry would have to  
proceed in civil court

Howard Jackson  
Cell # 651-508-7916

Can Show more proof in court if we  
can't agree. #1 Text message #2 Pic  
12/23/2019  
#3 Audio Recording



(2)

Hi my name Howard Jackson A 3-yrs  
Resident on Emerson West St Paul A  
True time regular.

Before I got hired I believe Jason his  
name of last store manager Black guy  
and manager Maria the (2) was running  
Store.

Spoliation Maria store manager told me  
it was good Jason left because the (2)  
was stealing carton of cigarettes and  
lottery.

Also maria stated the Stud lady black American  
Ex employee who got fired for stealing a  
Carton of Cigarettes.

Was trespass from store but still comes in store  
because of friendship of her and Maria no  
check cameras the shift we worked together Me  
and Maria Stud came in back before by Dish are

How do I know all this because Maria came up to  
me asked for my # before I got hired got text  
to prove it on phone.

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(3)

My concerns grew due to me thinking she had gotten too personal with me And we or i have never done anything to her person

Started on NOV 12<sup>th</sup> 2019 When i texted Store manager Tracy showed a pile of Scratch tickets, and ONLY one has been played.

A.M Shift I was working that day me and maria and another lady worker asked ~~any~~ both did anyone touch the tickets.

Both response was no that what made me text big boss Tracy, Told me don't worry about it.

Get more worse than this heard rumors Carl like to drink and show up at work time Drunk.

I had to witness it my self one day Maria asked me. When she get off did I wanted to dr said yes.

Carl asked me ~~to~~ to bring him a beer up to work So i did just that as maria took me to stor put beer on the side that was off the proper Maria Need the whole time what i did.

#4

ON NOV 18th 902 PM BOSS Tracy Texted Me about the drama that happened with EX-employee lady and maria.

Me and EX-employee was friends so i asked her was it true what maria said about you she didn't liked that.

Night before Me and maria was drinkin I had left my phone in car. And maria called the store to see if I was still there.

That's when EX-worker confronted maria on phone about it.

Maria came up to job cussing me out loud outside when people was around my cousin. And a lady who filed out application and didn't get job. black Am

Tracy stated in text talk tomorrow and said stay away from drama man don't want it to cost your job.



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(5)

I texted back said nothing should cost me my job if you had a manager out of line.

Then told Tracy she is the same lady who showed me text that you harassing & saying nasty things. And sending long text message.

Then told Tracy about her and last manager and Ex worker stud lady stealing.

Then told him to check cameras the day before the clock in-out office, Maria had legs all popped open in Air in chair ~~said~~

Said when you going to give it to me +tt told Tracy about the text Maria send me on Nov, 8th 909 pm.

Saying Screenshots can be a bitch, I told you he was creepy Maria talking about Tracy.

Seen and heard it all about big boss store manager Tracy.





Tracy told me to stop worrying about the misconducts in store the big people in office would find and catch them stealing.

(Discrimination) Tracy can bust and show me and everyone else cameras in back of EX black American worker stealing her and EX Speedway boyfriend.

But Tracy wouldn't do nothing about me say Maria and Jason was stealing and told Tracy of the blunt wrap Maria said she stole for me at work.

Not pointing fingers just exposing the truth of illegal misconducts at Speedway.

Spoil-Alert It was and had to be true about the friendship of Tracy and the car why a white guy miss over 1 week of work and you guys let him back in.

Why everytime a black American worker miss day's. Then Tracy goes around telling every if Shay Justice miss any day again would be fired.



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#  
⑦

White American  
Carl, Tracy, Maria get away with illeg.  
things.

Now. Why did Tracy go pick-up Carl  
at 2am and Carl was supposed to be at  
work at 10pm on Dec ~~5th~~ 2019.

Really tight relationship the ② have  
why did i called off on Dec 7th wasn't  
feeling too good.

But really was mad what happened on my  
shift on Dec 6th 2019.

Carl was selling drugs that whole night  
while i busted my butt.

Just look at camera's by the Drinks area  
Hot chocolate. Can be seen saying to A  
black American lady.

Also Carl could be seen getting scared  
when a heavy-set police officer walked i  
and Carl Dumping drugs in trash can  
by Hot chocolate. Can seeing him lookin  
in it when police left store.



⑧

Carl is Not a manager so why would Tracy give him safe # Carl brags about.

How come Carl gets overtime of over 70 of O.T is he clocking out maybe not ON what he told Maria and me all ③ working that day u could leave early leave me with your clock out # I got you

his check was over \$1500.00 a few fr showed me pay tabs in store bragging

But wouldn't let me get some O.T when working with other people who asked to stay longer with Tracy telling me.

Tracy blocked me on phone on Dec 14 said Jussic big man told him to do s

The problem was all the water on floor people kept complaining about talking about if they fall they would sue company

Told Tracy Nobody wants to mop and not job to force anyone so asked to lock door to keep it dry and no liability of company if someone fall told me don't worried about it,

7

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Before all that had happened George made me call Tracy.

Because he said why locking doors told him why mad said getting tired of fucking mopping by me self.

He ringing people me mopping said Be don't cuss or talk to me like that

I said I didn't he got in his feelin's yall can see on camera's A customer come to the backroom Dish spot.

And said you are doing the right thing who cares what they say he said. And said George was wrong for cussing and getting in his feelings.

He is A white boy that Tracy would b. Me and said it's A write up for me the next day in office with maria are

I then told Tracy maria that I would be Audio recording on phone and brown up all illegal misconducts Tracy then say to clock out and leave.

→



#10

Didn't know i was still Recording  
when i was on phone with District man

would of think he would listen what  
happened Next was him being rude.

first thing he asked don't call my phone  
3 times blowing it up after i ~~did~~ didn't pick  
up the first time.

Blew me away i stated this is only my  
first time calling you Tracy was blowing  
his phone up.

Then stated next why i kept blowing the  
phone up when he at home spending time  
with family.

He couldn't be for real I called Tracy one  
about the wet floor. And hung up on  
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to workers like that.

And Tracy didn't know the full story  
then blocked me.



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11  
Told Speedway District manager ~~what~~  
we should set a time to meet up abo  
personal illegal misconducts going on.  
with Maria, Carl, Tracy told him my  
concerned are bigger than big

The District manager set a time to meet  
me at 9am on Dec 16th Monday 2019  
at Speedway Job.

Told him will have complaint and notice  
to see letter meeting up.

Statement told Tracy I want back the  
hours he hired me for 2pm-10pm  
After the Maria thing he put me on  
6pm-2am, told him so many times  
didn't like it or want to work them hours

Told Tracy why my hours changed due to  
~~the~~ Maria thing going on he said no  
it's a lie.

Then moved Maria to morning shift  
me working crazy hours I didn't get  
hired for.

Marked day I wanted off on calendar &  
with the reason why and told me that I  
was not going to work.



(12) OF the illegal things I said he was doing  
 Asked me why did I  
 well it sure didn't work out  
 it went to Tracy the Fav.

I left store was off Sunday - Monday  
 today Dec 15th I went to my store, job  
 that is around the corner where  
 I live on Emerson Ave E West St. Paul.

Co-workering asked did I check schedule  
 Said No I should.

So I went on to back to check it and  
 Notice Tracy and District manager for  
 me off the whole 7 day's work schedule

Without me knowing and more misco  
 on me Reporting misconduct's illegal Activ

Notice to sue for compensation of 40  
 a week I worked for wrongfully Removing  
 off working schedule for one week  
 seeking \$400.00 around what I make  
 tubs ..

wrongfully Retaliation on me have  
 Audio Recording and Proof of doing so  
 and discriminated against me for Report  
 illegal misconduct on Carl Tracy, Maria  
 Seeking damage of \$850,000.

Should had never been wrongfully on after  
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 I thought would be right ..

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